



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

JUN 26 2008

AE-17J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Block, President
Laminated Products, Inc.
5718 52nd Street
Kenosha, Wisconsin 53142

Re: Notice of Violation

Dear Mr. Block:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to Laminated Products Inc. (you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. §7413(a)(1). We find that you are violating the Wisconsin State Implementation Plan (SIP) at your Kenosha, Wisconsin facility.

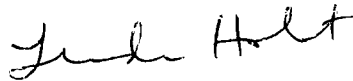
Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order, and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply, and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The contact in this matter is Ms. Kathy Memmos. You may call her at (312) 353-4293 to request a conference. You should make the request as soon as possible, but no later than 10 calendar days after you receive this letter. We should hold any conference within 30 calendar days of your receipt of this letter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Cheryl L. Newton".A handwritten signature in cursive script, appearing to read "Cheryl L. Newton".

Cheryl L. Newton,
Acting Director
Air and Radiation Division

cc: Daniel Schramm, Air Management Supervisor
Wisconsin Department of Natural Resources

1. Wis. Admin. Code NR Chapter 423.035, “Industrial Cleaning Operations,” was incorporated into the federally enforceable Wisconsin SIP at 66 *Fed. Reg.* 56931 on November 13, 2001.
2. Wis. Admin. Code NR 423.035(1)(a) states that this rule applies to industrial cleaning operations at facilities which are located in Kenosha, Milwaukee, Ozaukee, Racine, Washington or Waukesha County and have maximum theoretical emissions (MTE) of volatile organic compounds (VOCs) from the facility, excluding any MTE of VOCs specifically subject to NR 419.05, 419.06 or 419.08, ch NR 420, 421, or 422, or s. 423.03, 423.05, 424.04 or 424.05, of 25 tons per year or more.

3. Wis. Admin. Code NR 423.035(3)(a)(3) specifies a VOC content limit for solvents and solvent solutions used in industrial cleaning operations of 3.8 lb per gallon for general cleaning activity and 5.8 lb per gallon for polyvinylchloride surfaces.
4. Wis. Admin. Code NR 423.035(9)(a) states that to determine applicability under NR 423.035(1), each owner or operator of an industrial cleaning operation at a facility located in Kenosha, Milwaukee, Ozaukee, Racine, Washington or Waukesha County shall maintain records of the MTE of VOCs from the facility, excluding any MTEs of VOCs specifically subject to NR 419.05, 419.06 or 419.08, ch NR 420, 421, or 422, or s. 423.03, 423.05, 424.04 or 424.05.

Factual Background

5. Laminated Products owns and operates the Kenosha facility located at 5718 52nd Street, Kenosha, in Kenosha County, Wisconsin.
6. Laminated Products is a manufacturer of laminated kitchen countertops, cultured marble vanity tops, cabinets and vanity sink tops.
7. On May 21, 2007, Wisconsin Department of Natural Resources (WDNR) conducted a full compliance evaluation.
8. Laminated Products has been using 100 percent toluene as one of three cleaning solvents to wipe off residual glue from fabricated countertops since they began plant operation in around 1984.
9. Laminated Products used approximately 1,330 gallons of toluene in 2005 and about 605 gallons of toluene in 2006. The Material Safety Data Sheet showed the VOC content of toluene to be 7.24 lb per gallon.
10. The MTE of VOCs in Wis. Admin. Code NR 423.035(1) exceeds the 25 tons per year threshold.
11. On August 15, 2007, WDNR issued Laminated Products a Notice of Violation letter.

Wis. Admin. Code NR 423.035 Violations

12. Laminated Products was in violation of Wis. Admin. Code NR 423.035(3)(a)(3), which specifies a 3.8 lb of VOC per gallon limit for general cleaning activity, and 5.8 lb of VOC per gallon limit for polyvinylchloride surfaces until December 17, 2007.
13. Laminated Products was in violation of Wis. Admin. Code NR 423.035(9)(a), which requires each owner or operator of an industrial cleaning operation at a facility located in Kenosha, Milwaukee, Ozaukee, Racine, Washington or Waukesha County to maintain records of the MTE of VOCs from the facility, excluding any MTEs of VOCs specifically subject to NR

419.05, 419.06 or 419.08, ch NR 420, 421, or 422, or s. 423.03, 423.05, 424.04 or 424.05 until December 17, 2007.

Environmental Impact of Violations

Emission of volatile organic compounds contributes to the formation of ground-level ozone and smog. Breathing ozone can trigger a variety of health problems including chest pain, coughing, throat irritation, and congestions. It can worsen bronchitis, emphysema, and asthma. Ground-level ozone also can reduce lung function and inflame the linings of the lungs. Repeated exposure may permanently scar lung tissue. Ground-level ozone can have detrimental effects on plants and ecosystems. These effects include: interfering with the ability of sensitive plants to produce and store food, making them more susceptible to certain diseases, insects, other pollutants, competition and harsh weather; damaging the leaves of trees and other plants, negatively impacting the appearance of urban vegetation, national parks, and recreation areas; and reducing crop yields and forest growth, potentially impacting species diversity in ecosystems.

6/26/08

Date



Cheryl L. Newton,
Acting Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Tracy Jamison, certify that I sent a Notice of Violation, No. EPA-5-08-WI-[], by

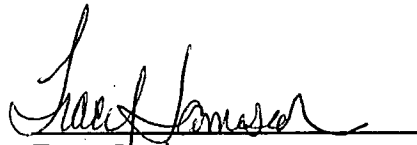
Certified Mail, Return Receipt Requested, to:

Robert Block, President
Laminated Products, Inc.
5718 52nd Street
Kenosha, Wisconsin 53142

I also certify that I sent copies of the Notice of Violation by first class mail to:

Daniel Schramm, Air Management Supervisor
Wisconsin Department of Natural Resources
Southeast Region
2300 North Dr Martin Luther King JR Dr
Milwaukee, Wisconsin 53212

on this 26 day of June, 2008.


Tracy Jamison
Office Automation Clerk
AECAS, (MI/WI)

CERTIFIED MAIL RECEIPT NUMBER: 7001 0320 0006 0185 9631